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[Additional counsel on signature page]

***Class Counsel***

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

KIM ALLEN, LAINIE RIDEOUT, and  
KATHLEEN HAIRSTON, on behalf of  
themselves, all others similarly situated,  
and the general public,

Plaintiffs,

v.

SIMILASAN CORPORATION,

Defendant.

CASE NO.: 3:12-cv-00376-BAS (JLB)  
CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR ATTORNEY'S  
FEES, COSTS AND INCENTIVE  
AWARDS**

(HEARING DATE SET BY ORDER  
GRANTING PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT [ECF  
NO. 204])

Judge: Hon. Cynthia A. Bashant  
Courtroom: 4B (Schwartz Courthouse)  
Date: Aug. 1, 2016  
Time: 10:30 a.m.

1       **PLEASE TAKE NOTICE** that on August 1, 2016 at 10:30 a.m., or as soon thereafter  
2 as it may be heard, in Courtroom 4B before the Honorable Cynthia A. Bashant of the United  
3 States District Court for the Southern District of California, located at 221 West Broadway,  
4 San Diego, California 92101, Plaintiffs Lainie Rideout and Kathleen Hairston will, and  
5 hereby do, move this Court for an Order requesting that:

- 6           1. Plaintiffs' request for an order granting Plaintiffs an award of attorneys' fees to  
7           Class Counsel in the amount of \$545,000, inclusive of costs; and
- 8           2. Incentive awards to Class Representatives in the amount of \$2,500 each for their  
9           time and effort in this litigation.

10       This Motion is timely filed pursuant to Federal Rule of Civil Procedure 23.

11       This Motion is based on this Notice, the accompanying Memorandum of Points and  
12 Authorities, the accompanying Declarations, all of the files and records of this action, and  
13 on any additional material that may be elicited at the hearing of this motion, for which  
14 Plaintiffs are requesting oral argument.

15  
16 Dated: June 20, 2016

Respectfully submitted,

17                               /s/ Ronald A. Marron

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